

Bridget M. Donegan, OSB No. 103753
BOISE MATTHEWS DONEGAN LLP
805 SW Broadway, Suite 1900
Portland, OR 97205
(503) 228-0487
bridget@boisematthews.com

Of attorneys for Plaintiff Loujain Hathloul Alhathloul

Nika Aldrich, OSB #160306
Email: naldrich@schwabe.com
SCHWABE, WILLIAMSON & WYATT, P.C.
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503-222-9981
Facsimile: 503-796-2900

Of Attorneys for Defendant DarkMatter Group

Clifford S. Davidson, OSB #125378
Email: csdavidson@swlaw.com
SNELL & WILMER L.L.P.
601 SW Second Avenue, Suite 2000
Portland, OR 97204
Telephone: (503) 624-6800
Facsimile: (503) 624-6888

*Attorney for Defendants
Marc Baier, Ryan Adams, and Daniel Gericke*

(A complete list of counsel appears on the signature page.)

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**LOUJAIN HATHLOUL
ALHATHLOUL,**

Plaintiff,

vs.

**DARKMATTER GROUP, MARC
BAIER, RYAN ADAMS, AND DANIEL
GERICKE,**

Defendants.

No. 3:21-cv-01787-IM

**JOINT MOTION TO EXTEND
JURISDICTIONAL DISCOVERY PERIOD**

CERTIFICATION PURSUANT TO L.R. 7-1

The undersigned hereby certify that they have met and conferred, and that they mutually consent to the requests sought herein.

JOINT MOTION TO EXTEND 60-DAY JURISDICTIONAL DISCOVERY PERIOD

NOW COME the parties to the above-captioned action and, by and through their undersigned counsel, jointly move to extend the 60-day period for jurisdictional discovery by an additional 13 days.

Plaintiff filed a Joint Proposed Jurisdictional Discovery Order on March 29, 2024 proposing that jurisdictional discovery shall be completed by no later than 60 days of the proposed order. (ECF 89). On March 29, 2024, the Court ordered the parties to conduct limited jurisdictional discovery consistent with the Joint Proposed Jurisdictional Discovery Order. (ECF 90). Thus, jurisdictional discovery was ordered to be complete by no later than May 28, 2024. The parties jointly move the Court to extend the jurisdictional discovery period for an additional 13 days, thereby extending the deadline until June 10, 2024.

This joint request comes due to the need to accommodate the schedules and obligations of overseas witnesses who will participate in jurisdictional discovery. The parties respectfully submit that these reasons provide good cause for the requested extension.

WHEREFORE, the parties jointly request that the Court grant this motion to extend the 60-day period for jurisdictional discovery by an additional 13 days, thereby extending the deadline until June 10, 2024.

DATED this 30th day of May, 2024.

Respectfully submitted,

BOISE MATTHEWS DONEGAN LLP
Bridget M. Donegan, OSB No. 103753
bridget@boisemattthews.com

s/ Christopher E. Hart (by permission)
Christopher E. Hart (*pro hac vice*)
Anthony D. Miranda (*pro hac vice*)
Andrew Loewenstein (*pro hac vice*)
FOLEY HOAG LLP
155 Seaport Boulevard
Boston, MA 02210
(617) 832-1000
chart@foleyhoag.com
adm@foleyhoag.com
aloewenstein@foleyhoag.com

Carmen Cheung (*pro hac vice*)
Claret M. Vargas (*pro hac vice*)
Daniel McLaughlin
CENTER FOR JUSTICE AND
ACCOUNTABILITY
268 Bush Street, #3432
San Francisco, CA 94104
ccheung@cja.org
cvargas@cja.org

David Greene (*pro hac vice*)
Sophia Cope (*pro hac vice*)
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
(415) 436-9333
davidg@eff.org
sophia@eff.org

Attorneys for Plaintiff

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Nika Aldrich
Nika Aldrich, OSB #160306
Email: naldrich@schwabe.com

Anthony T. Pierce (*pro hac vice*)
Email: apierce@akingump.com
Caroline L. Wolverton (*pro hac vice*)
Email: cwolverton@akingump.com
James E. Tysse (*pro hac vice*)
Email: jtysse@akingump.com
AKIN GUMP STRAUSS HAUER & FELD LLP
2001 K Street N.W.
Washington, D.C. 20006
Tel: (202) 887-4000
Fax: (202) 887-4288

Natasha G. Kohne (*pro hac vice*)
Email: nkohne@akingump.com
AKIN GUMP STRAUSS HAUER & FELD LLP
580 California Street, Suite 1500
San Francisco, CA 94104
Tel: (415) 765-9500
Fax: (415) 765-9501

Attorneys for Defendant DarkMatter

SNELL & WILMER L.L.P.

s/ Clifford S. Davidson (by permission)
Clifford S. Davidson, OSB No. 125378
csdavidson@swlaw.com

Attorney for Defendants
Marc Baier, Ryan Adams, And Daniel Gericke